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Attorneys for Defendants
TeachBK, Inc., Ilya Kiselev
& Andrei Burstev

Attorneys for Plaintiff
Miriam Goldberg

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

Miriam Goldberg,

Plaintiff,

v.

TeachBK, Inc., *et al.*,

Defendants.

) Case No.: 3:24-cv-4525

)
) **JOINT STIPULATION AND**
) **[PROPOSED] ORDER TO ENLARGE**
) **DEADLINE TO COMPLETE**
) **MEDIATION**

Plaintiff Miriam Goldberg and Defendants TeachBK, Inc., Ilya Kiselev, and Andrey Burtsev (collectively, "Defendants") hereby agree and stipulate as follows:

The Court referred this case to mediation on February 28, 2025. [ECF No. 47]. Pursuant to the ADR Local Rule 6.4(c), mediation must be completed by May 29, 2025. Given that defense counsel seeks to withdraw from representation of Defendants in this case, it would be in the parties' best interest to delay mediation until the pending motion to withdraw is resolved.

Accordingly, the parties stipulate and jointly request that the Court enlarge the deadline to complete mediation through July 31, 2025.

IT IS SO STIPULATED.

Dated: April 29, 2025

Respectfully submitted,

SLATER LEGAL PLLC

By: /s/ James M. Slater

James M. Slater (admitted *pro hac vice*)

Attorney for Plaintiff Miriam Goldberg

LAW OFFICES OF ALLA V. VOROBETS

By: /s/ Alla V. Vorobets

Alla V. Vorobets (SBN 258586)

Attorney for Defendants TeachBK, Inc., Ilya Kiselev, and Andrei Burtsev

ATTESTATION OF CONCURRENCE

I, James M. Slater, am the ECF User whose ID and password are being used to file this **JOINT STIPULATION**. I attest that, pursuant to United States District Court, Northern District of California L.R. 5-1(i)(3), concurrence in the filing of this document has been obtained from counsel for Defendants. I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 29, 2025

SLATER LEGAL PLLC

By: /s/ James M. Slater

James M. Slater (admitted *pro hac vice*)

[PROPOSED] ORDER

Pursuant to the parties' stipulation, and good cause appearing, the Court ORDERS that mediation must be completed no later than July 31, 2025

Dated: _____

HONORABLE LISA J. CISNEROS
UNITED STATES MAGISTRATE JUDGE